

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

**GENOVA BURNS LLC**  
494 Broad Street  
Newark, New Jersey 0102  
Telephone: 973-535-7119  
**SUSAN S. LONG, ESQ.**  
slong@genovaburns.com  
*Counsel for Veronica Morales*

In re:

**GEORGE MORALES, JR.**

Debtor.

Case No. 24-16570-VFP

Chapter 13

Judge: Hon. Vincent F. Papalia

**VERONICA MORALES' OBJECTION TO  
CONFIRMATION OF CHAPTER 13 PLAN**

Veronica Morales, through undersigned counsel, hereby respectfully objects to the confirmation of Debtor's proposed Chapter 13 Plan (the "Plan") as follows:

- The Debtor must correct the calculation of equity in real property to reflect payment of the federal and state tax liens to be exclusively deducted from Debtor's 50% share.
  - The federal and state tax liens addressed in the Petition (Doc No. 1, Schedule D, Pages 19-21), Plan (Doc No. 3, Part 4(g)), and Proofs of Claim No. 6-2 and 23-1, are the sole obligation of the Debtor. It has not yet been verified whether additional liens, i.e. judgment liens, exist against the property and whether Debtor may be solely liable for same.
- The Debtor and Veronica Morales are involved in a pending marital dissolution proceeding in the Superior Court of New Jersey, Passaic County, assigned as Docket No. FM-16-1484-24.
  - Debtor and Ms. Morales are in the process of assessing Domestic Support

Obligations. Once determined, such priority obligations will adversely affect Debtor's ability to perform under the proposed Plan.

WHEREFORE, for the reasons set forth above, confirmation of the Debtor's Chapter 13 Plan as currently proposed should be denied.

Dated: August 29, 2024

Respectfully submitted,  
**GENOVA BURNS LLC**

By: /s/ Susan S. Long  
SUSAN S. LONG, ESQ.  
*Counsel for Veronica Morales*